

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
1300 I. Street, N.W., Suite 900
Washington, D.C. 20005
Telephone: 202-538-8000
Facsimile: 202-538-8100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF JOINT SUBMISSION IN
RESPONSE TO DKT. 419 RE: SEALING
PORTIONS OF FEBRUARY 22, 2022
ORDER ON JOINT DISCOVERY
LETTER BRIEF (DKT. 418)**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Parties’
7 Joint Submission in Response to Dkt. 419 Re: Sealing Portions February 22, 2022 Order on the
8 Parties’ joint discovery letter brief re Plaintiffs’ Rule 30(b)(6) deposition notices (Dkt. 418)
9 (“Order”). In making this request, Google has carefully considered the relevant legal standard and
10 policy considerations outlined in Civil Local Rule 79-5. Google makes this request with the good
11 faith belief that the information sought to be sealed consists of Google’s confidential information
12 and that public disclosure could cause competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portions of the Order.

14 4. The information requested to be sealed contains non-public, sensitive confidential
15 business information related to Google’s internal technological systems that could affect Google’s
16 competitive standing and may expose Google to increased security risks if publicly disclosed,
17 including details related to internal projects, identifiers, and cookies, and their proprietary
18 functionalities, which Google maintains as confidential in the ordinary course of its business and is
19 not generally known to the public or Google’s competitors.

20 5. Such confidential information reveals Google’s internal systems and operations and
21 falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3.

22 6. Public disclosure of such confidential information could affect Google’s competitive
23 standing as competitors may alter their system designs and practices relating to competing products,
24 time strategic litigation, or otherwise unfairly compete with Google.

25 7. On February 28, 2022, the parties conferred on the proposed redactions to the Order.
26 Plaintiffs take no position and do not oppose sealing the proposed redactions.

27 8. For these reasons, Google respectfully requests that the Court order the identified
28 portions of the Order to be sealed.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in San Francisco, California on February 28, 2022.

3
4 DATED: February 28, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

5 By /s/ Jonathan Tse
6 Jonathan Tse

7 *Attorney for Defendant*
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28